

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA

*

v.

*

Criminal No. ELH-20-0034

CHARVEZ BROOKS

*

Defendant.

*

* * * * *

**CONSENT MOTION FOR EXTENSION OF TIME TO RESPOND
TO DEFENDANT'S PRETRIAL MOTIONS**

The United States of America respectfully requests an additional 11 days to respond to the Defendant's Pretrial Motions. Counsel for the Defendant has indicated that he consents to the relief requested in this motion.

1. On October 6, 2023, the Court set a schedule for the filing of pretrial motions and for trial in this case. ECF No. 49. Pursuant to the current schedule, defense motions were due on December 8, 2023, the government's opposition is due on January 8, 2024, and replies are due on February 2, 2024. Id. The Defendant, through counsel, filed four pretrial motions on December 8, 2023. ECF Nos. 50, 51, 52, 53.

2. The government is preparing its responses to the Defendant's pretrial motions and respectfully requests an additional 11 days to complete its responses. The government's extension request is based on undersigned counsels' current workload in other cases, as well as their responsibilities in other significant on-going investigations.

3. Undersigned counsel has contacted counsel for the Defendant, who has indicated that he consents to the requested extension.

4. A proposed Order is attached for the Court's convenience.

WHEREFORE, the United States respectfully requests the Court grant this Motion and extend the deadline for the government to file its responses to the Defendant's pretrial motions to January 19, 2024.

Respectfully submitted,

Erek L. Barron
United States Attorney

By: /s/ Anatoly Smolkin
Anatoly Smolkin
Ari D. Evans
Assistant United States Attorneys

Dated: January 5, 2024